

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF IOWA**

IN RE:  BDC GROUP, INC.,  Debtor.	Chapter 11 Bankruptcy Case No. 23-00484  <b>EXHIBIT AND WITNESS LIST</b>  <b>Hearing Date: October 26, 2023</b>
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Creditor Keystone Savings Bank provides the following amended list and identifications. By filing and serving this document, Keystone Savings Bank does not waive and instead reserves any and all arguments, rights, and theories to which it is entitled.

**WITNESSES**

Keystone Savings Bank designates the following witnesses to testify at trial:

- Designated Representative of the Unsecured Creditor's Committee.
- Todd Shores.
- Dennis Bruce (reserves the right to call if Mr. Bruce appears at the hearing).
- Any witness necessary to lay foundation or authenticate an exhibit, listed or called by another party, to refute or respond to unanticipated evidence offered by another party, or for impeachment or rebuttal purposes.

**EXHIBITS**

Keystone Savings Bank designates the following exhibits for offering or use at trial:

	<b>Keystone Savings Bank's Exhibits</b>	<b>Objections [Cite Fed. R. Evid.]</b>	<b>Offered</b>	<b>Admit/ Not Admitted (A)-(NA)</b>
101	Proof of Claim 77			
102	Loan Payoffs			
103	Promissory Notes			
104	Select Security Agreements			

105	Select UCC Filings			
106	Loan Assignment Agreement			
107	Manchester Leasing Correspondence re Confirmation of Cure Payment			
108	[Placeholder] DIP Budget Through 2023 Year End			
109	[Placeholder] Records Declaration if Needed			

Keystone Savings Bank reserves the right to introduce any and all exhibits designated by the Debtor or any party in interest and any and all documents disclosed by the Debtor or any party in interest and deemed to be necessary in rebuttal or sur-rebuttal or for impeachment of any testimony or documents offered at trial. Keystone Savings Bank may use a declaration under Federal Rules of Evidence 5.803(6), 5.902(11), or 5.902(12) to establish foundation for records of regularly-conducted activities.

Dated: October 12, 2023

Respectfully Submitted,

SIMMONS PERRINE MOYER BERGMAN PLC

/s/ Abram V. Carls

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ATTORNEYS FOR KEYSTONE SAVINGS BANK

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on October 12, 2023, a copy of the foregoing document was filed with the Clerk of Court for the United States Bankruptcy Court for the Northern District of Iowa using the CM/ECF system, and served electronically on those participants that receive service through the CM/ECF system.

/s/ Abram V. Carls